

THE HONORABLE ROBERT J. BRYAN

U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

MARGARET DIBB, SHAUNA OVIST, and
WENDY GONDOS on behalf of herself and on
behalf of others similarly situated,

Plaintiffs,

vs.

ALLIANCEONE RECEIVABLES
MANAGEMENT, INC.,

Defendant.

NO. 3:14-CV-05835-RJB

**DECLARATION OF COUNSEL IN
SUPPORT OF AWARD OF
ATTORNEYS' FEES AND COSTS BY
LEEN & O'SULLIVAN, PLLC**

1. I am an attorney and have been licensed to practice in the following jurisdictions
on the indicated dates:

Admitted to the Washington State Bar Association (11/26/71)
United States Supreme Court (9/10/84)
United States Claims Court (9/5/84)
Ninth Circuit Court of Appeals (11/23/83)
Eighth Circuit Court of Appeals (3/5/91)
Seventh Circuit Court of Appeals (10-11-91)
United States District Court, Delaware (6/14/72)
United States District Court, Washington (11/71)
United States District Court, Eastern Dist. of Wisconsin (10/4/90)
Swinomish Tribal Bar Association (1994)

2. I retired from the practice of law in 2016 and have resigned from the Washington
Bar. I have been engaged in the private practice of law here in the Seattle area between 1979
and 2016. During that time, I have focused a substantial majority of my practice on consumer

1 financing issues mainly in the class action context. All the work I did in this case was done
2 when I was licensed.

3 3. I was also approved as class counsel in about 40 class actions, including, Morgan v.
4 Security Pacific Bank (King County Superior Court); Harris v. Beneficial Mortgage (King
5 County Superior Court); Sant v. Household Mortgage (Snohomish County Superior Court); and
6 Pagan v. Key Mortgage (King County Superior Court); and Peterson v. Norwest Mortgage
7 (King County Superior Court) which cases obtained injunctive relief and/or disgorgement of
8 illegally charged fees, similar to the case at bar. Our firm has implemented approximately \$10
9 million worth of class action settlements and judgments, and invalidated over \$110 million of
10 illegal debt.
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12 4. Leen & O'Sullivan originally defended the debt collection case in state court and
13 brought this case as an affirmative class action. The following table reflects the work done on
14 the case by the firm:
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16 NAME AND POSITION	17 DESCRIPTION OF WORK PERFORMED	18 RATE	19 HOURS BILLED	20 TOTAL
21 David Leen 22 Partner	23 Conferences with clients; worked on factual issues; worked on complaint; worked on correspondence; and worked on case strategy issues.	24 \$350	25 7.90	26 \$2,765.00
27 Sam Leonard Associate	Conferences with clients; researched and analyzed various legal and factual issues; worked on answer in collection action; worked on summary judgment in collection action; worked on case investigation; worked on complaint.	\$300	55.98	\$16,794.00

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Katy Box Associate	Researched and analyzed various legal and factual issues; worked on case investigation; worked on complaint and amended complaints; worked on discovery requests and responses; worked on case strategy; worked on discovery correspondence; prepared for and participated in discovery conferences; worked on other discovery issues; worked on response to motion to dismiss; worked on response to motion for summary judgment; worked on motion to amend complaint; prepared for and attended depositions; reviewed and analyzed deposition testimony; worked on motion for class certification.	\$300	85.10	25,530.00
Shannon Schulz Paralegal	Worked on answer in collection action; worked on summary judgment in collection action; worked on complaint; worked on response to motion for summary judgment; worked on pleadings and court filings; and worked on public records requests.	\$90	24.95	2,227.50
TOTAL:			173.93	\$47,316.50

5. The time summarized above was recorded contemporaneously with the work done consistent with firm policy.

6. Leen & O'Sullivan has also incurred the following out-of-pocket costs:

Long distance telephone charges and photocopies	\$21.46
Computer Research (Pacer)	\$8.20
Postage & Courier Services	\$392.20
Court reporter	\$1,540.13
Total	\$1,961.99

1 I swear under the penalties of perjury under the laws of the State of Washington that the
2 foregoing statement is true.

3 DATED this 1st day of June 1, 2017, at Seattle, Washington.

4 By: /s/ David Leen
5 David A. Leen
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CERTIFICATE OF SERVICE

I, Erika L. Nusser, hereby certify that on June 2, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Attorneys for Defendant

DATED this 2nd day of June, 2017.

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